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6 Attorney for Defendant  
JONATHAN FLORES  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,	)	CASE NO. CR 19-0584 RS
12	)	
13 Plaintiff,	)	STIPULATION AND ORDER CONTINUING
14 v.	)	STATUS DATE FROM FEBRUARY 11, 2020 TO
15 JONATHAN FLORES,	)	MARCH 17, 2020 AND EXCLUDING TIME
16 Defendant.	)	UNDER THE SPEEDY TRIAL ACT FOR THE
	)	SAME TIME PERIOD

17  
18 **STIPULATION**

19 This case is currently set for a status conference on February 11, 2020. Defense counsel was  
20 unexpectedly unavailable earlier this month and requires additional time for effective preparation of  
21 counsel, and thus requests that the next status date be continued to March 17, 2020. In light of defense  
22 counsel's statement, the government does not object to this request.

23 Defendant Jonathan Flores is out of custody on electronic monitoring.

24 The parties submit that the time between February 11, 2020 and March 17, 2020 should be  
25 excluded based on defense counsel's availability and need to review discovery and effectively advise her  
26 client. 18 U.S.C. § 3161(h)(7)(B)(ii) and (iv). The parties stipulate that the ends of justice served by the

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1 continuance outweigh the best interests of the public and the defendants in a speedy trial.

2 SO STIPULATED.

3  
4 DATED: January 28, 2020

\_\_\_\_\_  
5 SHAWN HALBERT  
6 Counsel for Jonathan Flores

7 DATED: January 28, 2020

8 DAVID L. ANDERSON  
9 United States Attorney

\_\_\_\_\_  
10 /s/  
11 CASEY BOOME  
12 Assistant United States Attorney

13 Attestation of Filer

14 I attest that I have the permission of the other signatories to this document to enter conformed  
15 signatures on their behalf and to file the document.

16 DATED: January 28, 2020

\_\_\_\_\_  
17 /s/  
18 SHAWN HALBERT  
19 Counsel for Jonathan Flores


1 **ORDER**

2 For the reasons stated, IT IS HEREBY ORDERED that the status conference scheduled for  
3 February 11, 2020 shall be continued to March 17, 2020.

4 IT IS FURTHER ORDERED that a time exclusion between February 11, 2020 and March 17,  
5 2020, is warranted, and the ends of justice served by the continuance outweigh the best interests of the  
6 public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the  
7 requested continuance would deny the defendant effective preparation of counsel and would result in a  
8 miscarriage of justice, and the continuance is appropriate given the status of the case. 18 U.S.C. §  
9 3161(h)(7)(B)(ii) and (iv).

10  
11 IT IS SO ORDERED.

12 DATED: 2/5/2020

  
\_\_\_\_\_  
HONORABLE RICHARD SEEBORG  
United States District Judge